

THE
COMPLIANCE
GROUP

February 24, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

Re: **Globalringer, Inc.**
CPNI Certification Pursuant to 47 C.F.R. Â§ 64.2009(e)
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Globalringer, Inc. ("Globalringer"), enclosed herewith please find the company's Annual Customer Proprietary Network Information Certification ("CPNI Officer Certification") covering 2011.

Should you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,



Christopher A. Canter
On behalf of Globalringer, Inc.

Globalringer, Inc.

Statement of CPNI Procedures and Compliance


Globalringer, Inc. ("Globalringer") provides exclusively carrier-to-carrier telecommunications services. It has no end-user customers. Consequently, Globalringer does not have a "subscriber" relationship with its customers and does not send "bills" to end-user customers. Globalringer does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. The company provides service only to other carriers. Globalringer typically does not obtain the end-user customer's billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end-user customer's service.

Globalringer may obtain certain call detail information concerning the calls routed through its carrier-to-carrier services. Because Globalringer provides exclusively carrier-to-carrier services, it does not use any call detail information that it obtains in the course of providing those services to attempt to market telecommunications services to the general public or any end-user customers.

Moreover, the call detail information obtained by Globalringer is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes.

Globalringer safeguards from improper use or disclosure by employees the call detail information that Globalringer obtains in providing its carrier-to-carrier services. Access to call detail information is limited to certain employees, and those employees are trained to protect call detail information from improper use or disclosure and informed that failure to protect that information will result in appropriate disciplinary action. In addition, Globalringer has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to Globalringer computers and call detail records. In the event of unauthorized CPNI access, Globalringer will notify the requisite law enforcement agencies, and the customer when possible.

Globalringer did not have any breach of its call detail records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because Globalringer does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through Globalringer, it cannot notify those end-user customers directly if a breach occurs. However, Globalringer has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than information that has been publicly reported, regarding the processes that pretexters or data brokers are using to attempt to access CPNI.



Globalringer, Inc.

**Annual CPNI Certification
47 C.F.R. §64.2009(e)
EB Docket No. 06-36**

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COMPANY NAME: Globalringer, Inc.
FILER ID: 827628
OFFICER: Sunil Sethi
TITLE: President & CEO

I, Sunil Sethi, hereby certify that I am an officer of Globalringer, Inc. ("Globalringer") and that I am authorized to make this certification on behalf of Globalringer. I have personal knowledge that Globalringer has established operating procedures that are adequate to ensure compliance with the Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to Globalringer or to any of the information obtained by Globalringer. See 47 C.P.R. §64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures Globalringer employs to ensure that it complies with the requirements set forth in §64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to Globalringer or to the information obtained by Globalringer.

Signed: 
On behalf of Globalringer, Inc.

Date: 02-23-2012